

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

v.

STEPHEN J. ROBESON,

Case No.: 21-cr-24-wmc

Defendant.

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MOTION FOR ENTRY OF  
PROTECTIVE ORDER GOVERNING DISCOVERY

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Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), the United States of America, by Timothy M. O'Shea, Acting United States Attorney for the Western District of Wisconsin, and Elizabeth Altman, an Assistant United States Attorney for said district, moves for the entry of a protective order, and in support thereof states as follows:

1. The indictment in this case charges defendants with illegally possessing a firearm in violation of Title 18, United States Code, Section 922(g)(1).

2. The discovery to be provided by the government in this case includes sensitive information, the unrestricted dissemination of which could adversely affect law enforcement interests and the privacy interests of third parties.

3. To promote the efficient and timely production of discovery material and to protect sensitive identities contained within the discovery material, the government respectfully requests an order providing that dissemination of the discovery materials be limited to:

(a) Members of the defense team (co-counsel, paralegals, investigators, litigation support personnel, and support staff);

(b) Experts or consultants retained to assist in the preparation of the defense;

(c) Potential witnesses interviewed by the defense team, if it is determined that it is necessary to share or display records to such witnesses for the purpose of preparing the defense of this criminal case; and

(d) The Court in connection with proceedings in this case.

The government specifically requests that discovery materials not be provided to the defendant.

4. I have communicated with Mr. Bugni and he opposes this proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Dated this 6th day of April.

Respectfully submitted,

TIMOTHY M. O'SHEA  
Acting United States Attorney

By: /s/  
ELIZABETH ALTMAN  
Assistant United States Attorney